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July 31, 2025

VIA ECF

Hon. Lewis J. Liman United States District Court Southern District of New York 500 Pearl Street, Room 1620 New York, NY 10007 SO ORDERED.

Date: 8/1/25

LEWIS/J. LIMAN United States District Judge

Re:

Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL; Jones et al. v. Abel et al., No. 1:25-cv-00779-LJL

Dear Judge Liman:

As counsel for Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the "Wayfarer Parties"), and pursuant to Your Honor's Individual Rules, we move for continued sealing of Exhibit A (Dkt. 494-1) to Blake Lively's motion for alternative service upon Robb Sullivan (Dkt. 492), who was an editor of the film *It Ends With Us* (the "Film").

Exhibit A, which is a text chain discussing Blake Lively's efforts to take control of certain aspects of the Film and citing from her 17-point list of demands, contains telephone numbers and/or email addresses of certain Wayfarer Parties and non-parties. *See In re Keurig Green Mt. Single-Serve Coffee Antitrust Litig.*, No. 14-MC-2542 (VSB), 2023 WL 196134, at *12 (S.D.N.Y. Jan. 17, 2023) (redaction of names, emails, and phone numbers of non-party individual employees of Keurig was warranted); *In re Zyprexa Products Liab. Litig.*, No. MDL1596JBWASC, 2005 WL 2237789, at *2 (E.D.N.Y. Mar. 2, 2005) (redaction of "confidential personal contact information such as home telephone numbers and addresses, pager and personal cell phone numbers, Social Security numbers" of Lilly's non-party employees was warranted).

Accordingly, the Wayfarer Parties respectfully request that Exhibit A (Dkt. 494-1) is permanently sealed. Submitted herewith is a redacted version of Exhibit A, with the telephone numbers and email addresses redacted.

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Respectfully submitted,

/s/ Kevin Fritz

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cc: all counsel of record (via ECF)

Dream team ♥ **2**

Thread Participants: Henny Grace (Owner); + Robb Sullivan; J B (Owner)

Active Participants: Henny Grace (Owner); + Robb Sullivan;

First Message: 4/18/2024 12:13:45 AM Last Message: 4/18/2024 9:56:20 PM

Henny Grace (Owner)
Ha done
4/18/2024 12:13:45 AM

Oona
PG-13!!

4/18/2024 12:14:52 AM

Oona No adjustments 4/18/2024 12:15:00 AM

Henny Grace (Owner)
Yep! Great news!
4/18/2024 12:15:01 AM

Oona Woot!

4/18/2024 12:15:17 AM

Robb Sullivan Woo hoo 4/18/2024 12:15:38 AM

+ Robb Sullivan

4/18/2024 12:15:42 AM

Oona
So are we keeping the thrust?
4/18/2024 12:15:52 AM

Robb Sullivan

I'll drink to that! Of course, I was planning on drinking anyways....:)

4/18/2024 12:16:00 AM

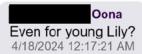
Henny Grace (Owner)

that's gonna end up being a Blake call honestly. If you can get her to keep it in and it's in the movie when I get it back it can stay in.

She has "approval" of that scene

4/18/2024 12:16:45 AM

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Robb Sullivan
I was just thinking the same thing
4/18/2024 12:17:41 AM

Henny Grace (Owner)
When she claimed she was unsafe - she redid the nudity
rider to get approval of young Lilly too

4/18/2024 12:17:41 AM

Oona

Got it

4/18/2024 12:17:52 AM

Robb Sullivan

4/18/2024 12:17:54 AM

Henny Grace (Owner)

Because she wasn't a part of writing that sex scene
4/18/2024 12:17:56 AM

Henny Grace (Owner)

And didn't want a character depicting her to have sex in high school honestly - it's all about control so she could get to where she will be next week. All good.

Hi Robb in Oona's room

4/18/2024 12:35:22 PM

Robb Sullivan
Ah! Popping in now
4/18/2024 12:35:34 PM

Oona

https://people.com/michael-j-fox-praises-taylor-swift-and-ryan-reynolds-people-50th-anniversary-exclusive-8634281

<__Library_SMS_Attach_1_3f_15_C80AE4_1_9360BD_1 > *®*

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4/18/2024 12:46:30 PM

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Henny Grace (Owner)

"Grow" v35AltA (filmmaker version) with Taylor
https://specreativeadvertising.cimediacloud.com/r/IFpK46oS5Zmn
(https://specreativeadvertising.cimediacloud.com/r/IFpK46oS5Zmn)

"Grow" v35AltB (filmmaker version) with Billie
https://specreativeadvertising.cimediacloud.com/r/19gvbNDAxsWL
(https://specreativeadvertising.cimediacloud.com/r/19gvbNDAxsWL)
4/18/2024 3:58:52 PM

Henny Grace (Owner)
I'll be five late to the call
4/18/2024 4:58:15 PM

Robb Sullivan
OK, I'll let everybody know and we'll wait for you
4/18/2024 4:58:34 PM

Dona
Be right there. Just got off phone with Jamey
4/18/2024 5:02:18 PM

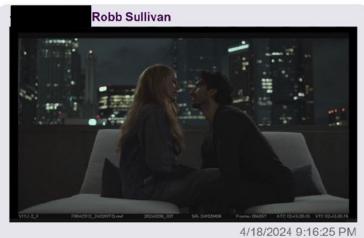
Robb Sullivan
All good
4/18/2024 5:02:31 PM

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Henny Grace (Owner) New text - If you or someone you know is experiencing domestic violence, help is available. Visit nomore.org or call.....

4/18/2024 9:04:13 PM



Robb Sullivan 2 hr, 3 mins, 36 seconds 4/18/2024 9:48:37 PM

> Henny Grace (Owner) Ok! About the same Henny Grace (Owner) But with more in it

Robb Sullivan Damn straight 4/18/2024 9:56:20 PM

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